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**IN THE UNITED STATES BANKRUPTCY
COURTFOR THE NORTHERN DISTRICT OF
TEXAS DALLAS DIVISION**

IN RE:	§	CHAPTER 11
NATIONAL RIFLE ASSOCIATION OF AMERICA and SEA GIRT LLC	§	CASE NO. 21-30085-hdh11
DEBTORS¹	§	JOINTLY ADMINISTERED

**APPLICATION OF THE DEBTORS FOR AN ORDER AUTHORIZING
THE RETENTION AND EMPLOYMENT OF ANKURA CONSULTING
GROUP, LLC AND APPOINTMENT OF LOUIS E. ROBICHAUX IV
AS THE DEBTORS' CHIEF RESTRUCTURING OFFICER**

Debtors National Rifle Association of America and Sea Girt LLC (collectively, the “Debtors”), file this application (the “Application”) for an order, substantially in the form attached hereto as Exhibit A(the “Proposed Order”) and pursuant to section 363(b) of title 11 of the United States Code (the “Bankruptcy Code”) authorizing the retention and employment of Ankura Consulting Group, LLC (“Ankura”) to provide chief restructuring officer services, and appointing Louis E. Robichaux IV to serve as the Debtors’Chief Restructuring Officer (the “CRO”) in accordance with the terms and conditions outlined in the Engagement Agreement (as defined below)

¹ The last four digits of the Debtors’ taxpayer identification numbers are: 6130 (NRA) and 5681 (Sea Girt). The Debtors’ mailing address is 11250 Waples Mill Road, Fairfax, Virginia 22030.

for in these chapter 11 cases. In support of the Application, the Debtors incorporate by reference the Declaration of Louis E. Robichaux IV in support of the Application (the “Robichaux Declaration”), attached hereto as **Exhibit B**. In further support of the Application, the Debtors state as follows:

JURISDICTION AND VENUE

1. The Court has jurisdiction over these chapter 11 cases and this Application pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding within the meaning of 28 U.S.C. § 157(b).
2. Venue is proper in this District under 28 U.S.C. §§ 1408 and 1409.

BACKGROUND

3. On January 15, 2021 (the “Petition Date”), the Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code.
4. The Debtors are operating their businesses and managing their properties as debtors in possession pursuant to section 1107(a) and 1108 of the Bankruptcy Code.
5. On January 20, 2021, the Court entered an order [Docket No. 36] authorizing the joint administration and procedural consolidation of the chapter 11 cases pursuant to Bankruptcy Rule 1015(b).
6. On February 4, 2021, the United States Trustee for the Northern District of Texas (the “U.S. Trustee”) appointed an official committee of unsecured creditors pursuant to section 1102 of the Bankruptcy Code (the “Committee”) [Docket No. 105].
7. A detailed description of the Debtors’ business, capital structure, and the events leading to the Debtors’ bankruptcy is set forth in the Declarations of Shawne E. Soto [Docket No. 10], Robert

G. Owens [Docket No. 11], and Sonya B. Rowling [Docket No. 12] (the “First-Day Declarations”) and Debtors’ Informational Brief in Connection with Voluntary Chapter 11 Petitions [Docket No. 31] filed on January 20, 2021, which are incorporated herein by reference.

RELIEF REQUESTED

8. By this Application, the Debtors seek the entry of an order pursuant to sections 105(a) and 363(b) of the Bankruptcy Code authorizing the retention and employment of Ankura and appointment of Louis E. Robichaux IV of Ankura as the Debtors’ CRO, consistent with the terms of the engagement agreement dated as of April 2, 2021 between Ankura and the Debtors (the “Engagement Agreement”), a true and correct copy of which is attached as **Exhibit 1** to the Robichaux Declaration.

9. The relief requested in this Application is necessary to the successful administration of these Chapter 11 Cases, and to provide assurance to creditors, parties in interest and the Court that there is an independent fiduciary overseeing these proceedings, the Debtors’ reorganization, and the Debtor’s financial operations. The Debtors require the services of an experienced CRO to guide existing management through a restructuring of the Debtors’ operations and a successful resolution of these Chapter 11 Cases. Ankura is being retained specifically to provide CRO services. Ankura is not being retained as a general financial advisor. Therefore, there will be no duplication of the role of BVA as financial advisor.

10. The Debtors interviewed several potential CRO candidates before ultimately selecting Mr. Robichaux. Debtors’ counsel worked cooperatively with the Committee’s counsel in selecting CRO candidates and in connection with the engagement of Mr. Robichaux.

Qualifications

11. Mr. Robichaux is a highly qualified restructuring advisor and CRO with whom the bankruptcy counsel in these cases and the Court are very familiar. Mr. Robichaux has been a CRO in numerous other bankruptcy cases, including a number of non-profit bankruptcy cases.

12. Louis E. Robichaux IV is a Senior Managing Director at Ankura who provides restructuring, crisis management, financial advisory, and expert witness services to parties in a broad variety of distressed corporate settings. Mr. Robichaux has nearly 30 years of industry and restructuring experience, with significant expertise serving in CRO roles. He is based in Dallas, Texas.

13. Prior to joining Ankura, Mr. Robichaux was a principal in the restructuring advisory practice of a global professional services firm, Deloitte. Prior to joining Deloitte, Mr. Robichaux was a co-managing member and managing director of a national boutique crisis management and restructuring firm. Prior to that position, he was a senior restructuring practitioner at a large professional services firm and a Big Four professional services firm.

14. Mr. Robichaux has assisted numerous clients by serving in CRO, Chief Executive Officer, and Chief Financial Officer roles. A significant portion of these roles have been for distressed or challenged nonprofit organizations. Mr. Robichaux has served clients coast to coast, including in Puerto Rico. Mr. Robichaux has extensive testimony experience, both as an expert and as a company representative. A significant portion of his testimony experience has been in the bankruptcy courts in the Northern District of Texas, including the Court presiding over these bankruptcy cases.

15. Mr. Robichaux has received several prestigious awards during his career. For his role as Chief Restructuring Officer of Tuomey Healthcare System, he was awarded the *Turnaround Management Association* Non-Profit Transaction of the Year - 2016. In connection with the St. Francis' Hospital (Poughkeepsie, NY) §363 sale transaction, he and the other professionals in the

matter were awarded *M&A Advisor's* Restructuring Deal of the Year for 2014 (\$10 million - \$100 million). Finally, in connection with the successful reorganization of Venoco, Inc., Mr. Robichaux and the other professionals involved in the matter were awarded *M&A Advisor's* Energy Deal of the Year (\$100 million to \$500 million).

16. Mr. Robichaux is a former four-term (two years per term) elected member of the City of Highland Village City Council. He has also served on various non-profit and for-profit corporate boards and is active in a number of industry professional associations.

Scope of Services and Authority of CRO

17. The scope of Ankura's services, including the scope and authority of the CRO of the Debtors, is described in Section 1 of the Engagement Agreement.

Terms of Compensation

18. The Debtors propose to compensate Ankura on an hourly rate basis, and to reimburse for its actual, reasonable out-of-pocket and direct expenses, as set forth in the Engagement Agreement. Mr. Robichaux's hourly rate is \$1,155 per hour.

19. As set forth in section 1(b) of the Engagement Agreement, additional Ankura personnel may support and assist Mr. Robichaux in his role as the Debtors' CRO as required and upon the mutual agreement of Ankura and the Special Litigation Committee of the Debtors' Board of Directors. The hourly rates of other Ankura professionals that may assist Mr. Robichaux in his role as CRO are as follows:

Professional	Hourly Rate
Senior Managing Director & Managing Director (including the CRO)	\$900 - \$1,155

Professional	Hourly Rate
Other Professionals	\$410 - \$870
Paraprofessional	\$275 - \$330

20. However, neither Mr. Robichaux nor any of the other professionals or paraprofessionals from Ankura who may assist Mr. Robichaux in his role as CRO shall serve as a financial advisor to the Debtor or duplicate any of the services being provided by BVA as the Debtors' financial advisor in these cases.

21. Furthermore, as set forth in section 2(a) of the Engagement Agreement, the fees of Mr. Robichaux and any other Ankura professionals who may assist Mr. Robichaux in his role as the Debtors' CRO are subject to a "Full-Time Cap." The Full-Time Cap means fees billed to the Debtors for the CRO or any individual professional during any given month shall not exceed the standard hourly billing rate in effect when the services are rendered multiplied by 40 hours per week, as adjusted for actual number of workdays in the applicable month.

22. As further provided in section 2(b) of the Engagement Agreement, Ankura shall also be paid a restructuring fee in the amount of \$1,000,000 payable immediately upon the effective date of any Chapter 11 plan consented to, or accepted by, the Debtors.

23. Ankura periodically adjusts the billing rates of its professionals, including Mr. Robichaux. Changes in applicable hourly rates will be noted on the invoices for the first time period in which the revised rates became effective.

24. Because Ankura is not being employed as a professional under section 327 of the Bankruptcy Code, it will not be submitting fee applications pursuant to sections 330 and 331 of the Bankruptcy Code. Instead, the Debtors intend that the fees and expenses incurred by Ankura in

connection with the services under the Engagement Agreement be treated as administrative expenses of these Chapter 11 Cases and paid by the Debtors in the ordinary course of business. Ankura and Mr. Robichaux will provide monthly reports of fees and expenses to the U.S. Trustee and counsel for Committee appointed in these Chapter 11 Cases (“Committee Counsel”). If no objection is served on Debtors’ counsel within ten (10) days, the Debtors shall pay the invoice in full. If an objection is served with the ten (10) day objection period, it shall state in detail the basis for the objection, and the amount to which the objection is applied. The parties will endeavor to resolve the objection within the three (3) days after it is served before presenting it to the Court for resolution. Any amount of the invoice to which no objection has been served may be paid pending the resolution of the amount to which an objection has been served.

25. Mr. Robichaux’s hourly rate and the hourly rates of the other Ankura professionals and paraprofessionals who may assist Mr. Robichaux in his role as CRO are consistent with other professionals who serve in similar roles under similar circumstances from other firms with similar experience and qualifications. The Debtors believe that Mr. Robichaux’s rate and the rates of the other Ankura professionals and paraprofessionals are reasonable and consistent with rates charged by other similar firms in the market.

26. Courts have allowed fees and expenses incurred by professionals retained under section 363 of the Bankruptcy Code to be treated as and an administrative expense incurred by debtors in the ordinary course of business. *See In re UCI, Int'l, LLC*, Case No. 16-11354 (MFW)(Bankr. D. Del. Jul. 12, 2016) [Docket No. 16-11354] (authorizing retention of chief restructuring officer pursuant to section 363 of the Bankruptcy Code, and allowing the debtors to pay, in the ordinary course of business, fees and expenses incurred in connection with the chief restructuring officer’s retention);

In re Juniper GTL, LLC, Case No. 16-31959 (MI) (Bankr. S.D.Tex. May 24, 2016) [Docket No. 176] (same); *In re HII Technologies, Inc.*, Case No. 15-60070 (DRJ) (Bankr. S.D. Tex. Sept. 22, 2015) [Docket No. 32] (same); *see also In re First River Energy, LLC*, Case No. 18-50085 (Bankr. W.D. Tex. Feb. 13, 2018) [Docket No. 200] (authorizing retention of chief restructuring officer pursuant to section 363 of the Bankruptcy Code and treating incurred fees and expenses as an administrative expense following reports of compensation and expiration of objection period).

Indemnification

27. Subject to the approval of the Court and as more fully described in the Engagement Agreement, the Debtors have agreed to indemnify Ankura as set forth in Schedule I to the Engagement Agreement. The Debtors request that they be permitted to indemnify Ankura pursuant to the terms of the Engagement Agreement, subject only to the conditions and limitations set forth in the Court's Order granting this Application. Ankura has agreed to the same limitations to the indemnification provisions in its Engagement Agreement as are contained in the proposed order for the retention of the Committee's financial advisor Alix Partners, and those limitations are contained in the Proposed Order attached hereto as Exhibit A.

BASIS FOR RELIEF

28. The Debtors seek to employ and retain Ankura and appoint Mr. Robichaux as CRO pursuant to section 363 of the Bankruptcy Code and the terms of the Engagement Agreement.

29. Under applicable case law, in this and other jurisdictions, if a debtor's proposed use of its assets pursuant to section 363(b) of the Bankruptcy Code represents a reasonable exercise of the debtor's business judgment, such use should be approved. *See United Retired Pilots Benefit Prot. Ass'n v. United Airlines, Inc. (In re UAL Corp.)*, 443 F.3d 565, 571 (7th Cir. 2006); *Fulton State Bank v. Schipper (In re Schipper)*, 933 F.2d 513, 515 (7th Cir. 1991); *see also In re Delaware & Hudson*

Ry. Co., 124 B.R. 169, 175-76 (D. Del. 1991) (noting that courts have applied the “sound business purpose” test to evaluate motions brought pursuant to section 363(b) of the Bankruptcy Code); *Comm. of Equity Sec. Holders v. Lionel Corp. (In re Lionel Corp.)*, 722 F.2d 1063, 1071 (2d Cir. 1983) (“The rule we adopt requires that a judge determining a § 363(b) application expressly find from the evidence presented before him at the hearing a good business reason to grant such an application.”). Cases in which Section 363(b) applications were approved include: *In re Forest Park Medical Ctr. at Frisco, LLC*, Case No. 15-41684 (Bankr. E.D. Tex.); *In re El Paso Children’s Hospital Corp.*, Case No. 15-30784 (Bankr. W.D. Tex.); *In re Physicians Specialty Hospital of East El Paso, LP*, Case No. 07- 30633 (Bankr. W.D. Tex.).

30. The decision to retain Ankura and appoint Mr. Robichaux as CRO should be authorized because it is a sound exercise of the Debtors’ business judgment, supported by the Committee. Mr. Robichaux is well-qualified and equipped to provide the CRO duties outlined above, as he has done on many other occasions. Mr. Robichaux, in his capacity as CRO, will provide services that are in the best interests of all parties in interest in these Chapter 11 Cases.

Compliance with Bankruptcy Rule 6004(a) and Waiver of Bankruptcy Rule 6004(h)

31. To implement the foregoing successfully, the Debtors request that the Court find that notice of the Application is adequate under Bankruptcy Rule 6004(a) under the circumstances, and that the Court waive the 14-day stay of an order authorizing the use of property under Bankruptcy Rule 6004(h) to the extent applicable

CONCLUSION

WHEREFORE, the Debtors respectfully request that the Court (a) enter an order substantially in the form attached to this Application as **Exhibit A**, and (b) grant such other and further relief as

the Court may deem proper.

Dated: April 7, 2021

Respectfully submitted,

/s/ Patrick J. Neligan, Jr.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 5th day of April 2021 a true and correct copy of the foregoing was served via first class U.S. mail upon the parties named on the attached Master Service List.

/s/ Douglas J. Buncher
Douglas J. Buncher

**In re: Sea Girt LLC - Case No. 21-30080
In re: National Rifle Association of America - Case No. 21-30085**

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